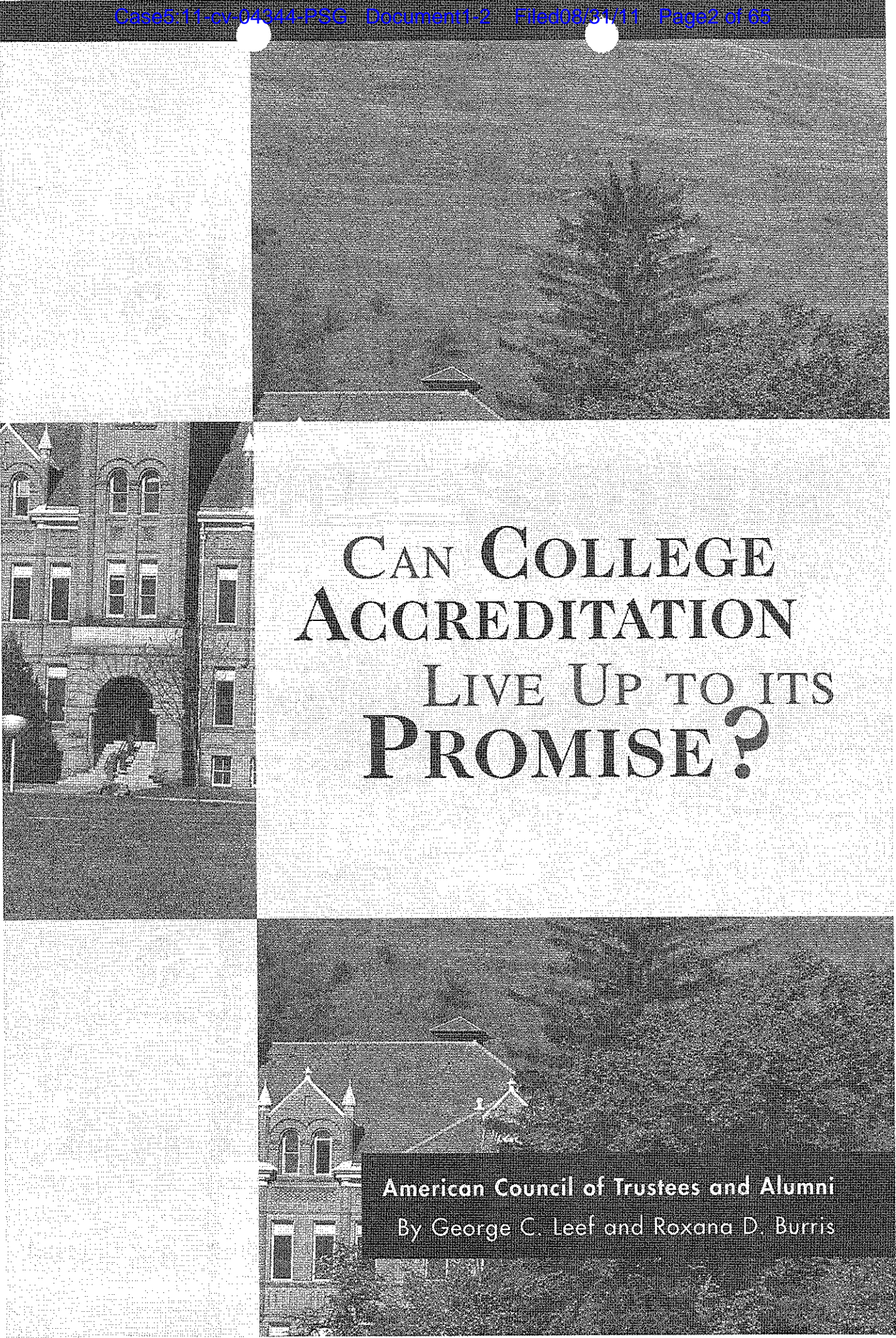


Exhibit E



CAN COLLEGE ACCREDITATION LIVE UP TO ITS PROMISE?

American Council of Trustees and Alumni
By George C. Leef and Roxana D. Burris

"The most important hope for accreditation is that it will result in positive changes for the education of students. This study explores how well that hope is being realized today and makes thoughtful recommendations for how it might be better realized in the future."

– Hank Brown
President, University of Northern Colorado

"This study makes it clear that trustees should be deeply involved in a process that can shape the future of their institutions for good or ill. More than that, it argues persuasively for a reappraisal of the whole system of accreditation."

– Candace de Russy
*Trustee, State University of New York;
Chairman, Academic Standards Committee*

"College accreditation is one of those things that we pretty much take as a given. This study, however, asks hard questions about accreditation and comes to sensible conclusions. It is important reading for anyone concerned about cost and quality in higher education."

– Jim Miller
former Director, Office of Management and Budget

"From my perspective, the great weakness in college accreditation is that it is sometimes done by people who are less expert than those whom they are supposedly overseeing. For that reason, the accreditors retreat into the kinds of input measures they can understand and verify. I commend this paper for helping to show that and other shortcomings of accreditation."

– Hans Mark
former Chancellor, University of Texas System

Foreword

Academic accreditation is a subject that is rarely discussed. Among the large educational controversies of our day, it barely registers with most people.

After hearing from a number of college professors, trustees, and administrators that the accreditation system seemed to do more to raise costs than to improve or even maintain educational quality, the American Council of Trustees and Alumni (ACTA) undertook an investigation of the accreditation system. In the report that follows, we present our findings and conclusions. Putting the matter in a nutshell, we conclude that accreditation has not served to ensure quality, has not protected the curriculum from serious degradation, and gives students, parents, and public decision-makers almost no useful information about institutions of higher education. Accreditation has, however, imposed significant monetary and non-monetary costs. We call for changes in policy at the federal, state, and institutional levels.

With this report, we hope to stimulate debate over the accreditation system. Should federal law make it the gatekeeper for billions in student aid funds? Should there be competition among accrediting agencies? Are there other means of ensuring academic quality? Those are among the issues that we believe ought to be analyzed and discussed more thoroughly.

Jerry L. Martin
President

Anne D. Neal
Executive Director

Acknowledgments

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The American Council of Trustees and Alumni is an educational nonprofit based in Washington, DC dedicated to academic freedom, quality and accountability. ACTA has also published *Losing America's Memory: Historical Illiteracy in the 21st Century* (2000); *The Shakespeare File: What English Majors Are Really Studying* (1996); and *The Intelligent Donor's Guide to College Giving* (1996).

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Can College Accreditation Live Up to its Promise?

By George C. Leef and Roxana D. Burris

Executive Summary

- *Accreditation of colleges and universities began as a voluntary system to set good standards and identify quality schools.*

The American system of accreditation of institutions of higher education is unique in that it subjects colleges and universities to peer review rather than governmental control. Emerging late in the 19th century, accreditation was originally a means for schools that were serious institutions of higher education to differentiate themselves from institutions that were colleges in name only.

- *Due to federal law, accreditation today is almost mandatory and nearly universal.*

Accreditation remained an option that colleges and universities could either take or decline until the 1952 Higher Education Act. That act created a link between eligibility for federal student aid funds and accreditation—only institutions accredited by federally-recognized accrediting bodies would be allowed to accept student aid funds. Thus, the accrediting associations became the gatekeepers of eligibility for federal funds, and as the importance of student aid in college budgets grew, accreditation changed from a voluntary service to an almost obligatory one. Today, for a college or university to lose accreditation would be a devastating and perhaps fatal blow.

- *Accreditation was assumed to be a reliable indicator of educational quality.*

The reason for linking accredited status with eligibility for federal student aid funds was that Congress feared that students might squander money on “fly by night” operations that would take the federal money but provide little or no educational value. Accreditation was thought to be a good proxy for quality.

- *Rather than ensuring educational quality, accreditation merely verifies that a school has what accreditors regard as the proper inputs and procedures.*

This report questions the assumption that accreditation is a proxy for quality. It finds little evidence that accreditation is a reliable quality indicator. The approach taken by most accrediting bodies is to check to see that colleges and universities have certain inputs and procedures. They do not look at learning outcomes and give no assurances about the quality of individual courses or programs. Nor do they insist that institutions maintain sound core curricula. According to reliable studies, the quality of undergraduate education in America has declined considerably, despite the fact that nearly all colleges and universities are accredited.

- *There are significant costs associated with the accreditation system.*

If accreditation does little to ensure quality, it does even less to address the other major worry about higher education—college costs. College tuition, fees, and other expenses have been rising much faster than the rate of inflation for years, but cost control is not among the accreditors’ concerns. To make matters worse, accreditation imposes some substantial costs of its own. There are monetary costs for annual membership fees and for the periodic accreditation reviews. There are opportunity costs, as school resources are diverted from other tasks in preparation for accreditation reviews. And there can be costs when institutions are driven to implement accreditors’ recommendations rather than using their own judgment on how best to provide the education their students need.

■ *Recommendations.*

This report concludes with a number of recommendations. First, the connection between eligibility for government student aid and accreditation should be severed. Second, trustees should become more active in the accreditation process. Third, state governments should bring needed competition to the field of accreditation by requiring that their colleges and universities solicit bids for accrediting services, just as they would for any other sort of service. Finally, the accreditation associations should start acting in a manner more akin to business consultants than monopolies.

I. The Accreditation System in American Higher Education

Virtually every undergraduate college and university in the United States is accredited by some accrediting organization. Accreditation is a recognition that the school has been evaluated and found to meet a set of standards determined by the organization to be necessary for a properly functioning educational institution. Many students, parents, trustees, and others interested in higher education assume that an assurance of quality goes with the accredited label, much as they assume that the Underwriters Laboratories (UL) label assures them of quality in an electrical appliance. In some of their documents, the accreditation agencies are careful to say that their standards are modestly designed to show that an institution simply “has a purpose appropriate to higher education and has resources, programs, and services sufficient to accomplish that purpose on a continuing basis.”¹

Elsewhere, however, one finds suggestions that accreditation is a means of promoting “high standards” or even “excellence.”² The rhetoric is not uniform, but the accreditors clearly believe that they help to make educational institutions better than they would be in their absence.

While most aspects of higher education in America are endlessly studied and critiqued, accreditation has received relatively little attention. Does accreditation in fact give students, parents, and taxpayers any assurance of quality? How often is it revoked or denied—and why? What costs are involved? Does the accreditation system have any undesirable consequences? Is there a better way to promote educational quality? Those are questions that have rarely been explored.

Given the enormous power that accrediting agencies wield, the lack of attention paid to them is surprising. The accreditors are the gatekeepers

for access to the enormous amount of federal student aid funds—more than \$60 billion annually.

Students who attend an unaccredited college are not eligible for federal student aid and therefore loss of or failure to receive “accredited” status would be a death knell for many institutions. Accordingly, schools pay close attention to the criteria for accreditation established by their accrediting associations and are usually quick to respond to any “concerns” expressed in an accreditation review.

This study will shine a light in this dark corner of higher education, exploring the questions raised above and more. Most importantly, it will address the public policy question: Should we make any changes in the law as it pertains to accreditation?

■ *The Accreditation Process*

Accreditation is the process whereby an organization evaluates an educational institution and then, if it is seen as satisfying the organization’s standards, is deemed “accredited.” The standards pertain to matters such as the mission and purposes of the institution, the organization of its human, financial and physical resources, whether it is accomplishing its purposes, whether it appears that the institution will be able to continue to meet its objectives, and whether it demonstrates integrity in its practices.

Accreditation is voluntary. No law requires that a college or university seek to be accredited, although as we will see later, federal policy has made it almost mandatory because non-accredited institutions are not eligible to receive federal student aid funds. New institutions seeking their initial accreditation must apply for it and present all the information sought by the accrediting association in a rather voluminous “self-study” document. Following the submission of the self-study, a team from the association, composed principally of administrators from other accredited schools, will conduct a campus visit that usually lasts for two days. Once an institution has been granted accredited status, it retains

it for ten years before it must seek reaccreditation, which will also require the self-study followed by an on-campus visit. If the accreditation agency finds weak spots in an institution, it almost always allows the school a grace period of a year or two in which to remedy the problem identified. Occasionally, schools have their accreditation suspended. Revocations of accreditation are extremely rare.

The accreditation associations do not publish their evaluations of colleges and universities, although the schools may publish some or all of their self-studies and the reports written by the visiting teams. The associations do publish lists of their members and any sanctions that they have imposed on schools.

Although accreditation is usually justified as a means of giving students and parents an assurance of educational quality, it is important to note that the accreditors do not endeavor to assess the quality of individual programs or departments. The visiting teams do not try to check on the quality of Professor Smith's English Composition class or that students in Professor Jones's American history class actually have learned important facts about American history. The accreditation system is not based on an evaluation of the results of an institution, but rather upon an evaluation of its *inputs* and *processes*. If the inputs and processes look good, acceptable educational quality is assumed. It is as if an organization decided which automobiles would be allowed to be sold by checking to make sure that each car model had tires, doors, an engine and so forth and had been assembled by workers with proper training—but without actually driving any cars.

Accreditation of colleges and universities is provided by six regional associations, each named after the region of the country in which it operates: New England Association of Colleges and Schools, Middle States, Southern, North Central, Western, and Northwest. Each is a private, nonprofit association. Specialized education programs, such as in law and medicine, are accredited by professional organizations like the American Bar Association. This study will restrict its attention to the general, college-wide accreditation of undergraduate institutions provided by the regional accreditors.

■ *A Brief History*

The accreditation system is only a little more than a century old. The first of the regional associations, the New England Association of Colleges and Schools, was formed in 1885. It was followed two years later by the Middle States Association. The North Central Association of Colleges and Schools and the Southern Association of Colleges and Schools were formed in 1895. Similar organizations were begun in the western parts of the United States early in the 20th century. The motivation for those organizations was a conviction among higher education leaders that American higher education would benefit from voluntary, non-governmental oversight. At that time, there were many different institutions calling themselves “colleges” or “universities” including normal schools, teachers colleges, junior colleges, technical institutions, art schools, music conservatories, liberal arts colleges, and professional schools. The associations sought to inject some order by giving a definition of what a “college” is. North Central, for example, said at the turn of the last century that a college must:

1. follow respectable entrance requirements
2. offer courses selected from the classics
3. ensure a minimum of eight departments headed by full-time instructors, each possessing at least a master's degree
4. provide a good library
5. properly prepare students for post-graduate study
6. have a maximum class size of 30
7. have a productive endowment of at least \$200,000.³

Establishment of an accreditation system was not among the first objectives of the educational associations. When it was proposed, accreditation met with some resistance on the ground that it would deflect the associations from their main goal of *improving* higher education; but by 1910 the idea that the associations would be providing a valuable service if they set accreditation standards, reviewed institutions, and published lists of schools that had met those standards, had caught on. North Central published the first list of accredited schools in 1913. It is

worth noting that the associations derive their income entirely from fees paid by their members—chiefly annual membership fees and fees for accreditation visits.

For a college or university to be able to say that it was accredited soon came to be a mark of distinction and a selling point with prospective students. Many—but not all—of the schools in existence in the early 20th century sought and received accreditation. The fact that some well-known schools did not seek accreditation indicates that it was not perceived as the only means by which a school could demonstrate its commitment to quality. In New England, for example, the University of Hartford, founded in 1877, did not become accredited until 1961; and Bentley College, founded in 1917, was not accredited until 1969. As more and more institutions sought accreditation, the influence of the accrediting associations grew. It has been written of North Central that, “By the end of its second decade of existence in 1915, it was apparent that the North Central Association was no longer just a forum for debate but had become an influential force for educational reform.”⁴

American higher education received a tremendous boost with the passage in 1944 of the Servicemen’s Readjustment Act (better known as the GI Bill), which offered to veterans the benefit of free access to higher education, provided they enrolled in institutions that had been approved by state education agencies. In 1952, the law was amended to authorize state education agencies to rely upon the results of private accreditation associations in determining which institutions would qualify to receive aid under the GI Bill. The Commissioner of Education was directed “to publish a list of nationally recognized accrediting agencies and associations he determines to be reliable authority as to the quality of training offered by an educational institution.”

All six of the regional accrediting associations were so recognized in 1952, thus making them more significant than previously, because now a college or university that failed to obtain or lost accreditation would be shutting itself off from the significant number of students who were able to attend college only because of their GI benefits. The law had, in effect, made them the gatekeepers for a large and growing source of revenue.

The importance of the accrediting associations was augmented further with the 1965 Higher Education Act. That law created new federal student aid programs for non-veterans and, as with the GI Bill, only accredited institutions were eligible to receive the funds. Non-accredited schools would now lose not only most veterans, but also the larger number of students who were eligible for federal student loans and grants. Access to billions of dollars in federal funds is thus entrusted to the decisions of six private organizations.

■ *Who Guards the Guardians?*

By the early 1990s, default rates on federally guaranteed student loans had reached about \$3 billion annually. Congress searched for a means of reducing those losses, and came to view the accreditation process as contributing to the accountability problem in the student aid programs. In 1992, the Education Department Inspector General testified before the House Education and Labor Committee that, “billions of dollars available to students each year through loans and grants are at risk, in part because the recognition process does not assure that the accrediting agencies use appropriate and effective policies to accredit schools.”⁵ Thus, the accrediting associations were assigned the blame, at least in part, for the managerial problems of the federal student loan program.

Congress followed up by enacting amendments to the Higher Education Act designed to strengthen the requirements that accrediting agencies would have to meet in order to be recognized by the Department of Education, specifying that accreditors must develop standards regarding:

(A) “success with respect to student achievement in relation to the institution’s mission, including, as appropriate, consideration of course completion, state licensing examinations, and job placement rates [note: this requirement was placed ninth in the 1992 amendments, but moved to first in 1998.];

(B) curricula;

- (C) faculty;
- (D) facilities, equipment and supplies;
- (E) fiscal and administrative capacity as appropriate to the specified scale of operations;
- (F) student support services;
- (G) recruiting and admission practices, academic calendars, catalogs, publications, grading and advertising;
- (H) measures of program length and the objectives of the degrees or credentials offered;
- (I) record of student complaints received by, or available to, the agency or association;
- (J) record of compliance with its program responsibilities under this subchapter and [the Work Study Program] based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and such other information as the Secretary may provide. ...”⁶

The law also required accrediting organizations to use certain procedures, including periodic on-site inspections and reviews, well-trained and knowledgeable accreditation teams, and to make public the information on their standards, appeal procedures, and the accreditation status of each institution under its jurisdiction.

The result of those legal changes, however, was negligible. Denials, revocations and suspensions of accreditation have always been very rare, and there was no perceptible increase in them following the adoption of the new regulations for the accreditors. If Congress meant to pull up the educational standards of colleges and universities, its regulations failed to have any impact. By many accounts, educational quality was in wide-

spread decline before the 1992 regulations and has been just as much so following them.

The Secretary of Education is allowed to terminate recognition of any accreditor that fails to comply with the standards and procedures detailed above. That has never happened. In one instance, to be discussed below, the Secretary of Education held up the reapproval of one agency because of its aggressive use of standards promoting racial, ethnic, and gender diversity to compel changes in school policies.

The accrediting associations, as we have seen, are *required* by law to establish standards covering the criteria mentioned above; they are also free to adopt “any additional standards not provided for in the Act.” That is to say, accreditors are free to impose standards that go beyond those Congress has mandated, thereby using the leverage they have over institutions to push them toward agendas particular to the accreditors. In the following chapter, we will discuss the most important “additional standard” that the accrediting associations have adopted, namely “diversity” standards.

■ *How Important is Accreditation?*

At its inception, accreditation was a truly voluntary activity. Colleges and universities were free to decide to seek accreditation if they thought that its benefits outweighed its costs, but were equally free to remain unaccredited if they felt that the costs (both monetary and in loss of managerial freedom) outweighed the benefits. The knowledge that institutions could drop accreditation if the criteria became too intrusive or onerous held the accrediting associations back from becoming dictatorial or attempting to influence education in any ideological direction. Now, however, that eligibility for financial aid is contingent upon achieving and retaining “accredited” status, accreditation is almost essential. Most colleges and universities feel that they could not survive financially without access to federal student aid. In effect, accreditors hold a gun—the threat of withholding federal funds—to the heads of colleges and universities. At times they have tried to use their

power to compel colleges to comply with accreditor agendas that are more political or philosophical than educational in nature.

The ostensible benefit of accreditation—assuring that higher education programs are of acceptable quality—will be considered in more detail in the following chapter. For now, we will only observe that despite the consumer welfare justification, the accreditation associations do not operate in a consumer-oriented manner. They do not publish their evaluations of institutions, although colleges and universities may publish part or all of their evaluation. Some institutions do, but many do not. If students and parents were interested in trying to learn all they could about a college or university they are considering, the accreditation system is of little assistance to them. As Professor Milton Greenberg has written of accreditation, “It is essentially a confidential process, which hides an institution’s advantages and disadvantages.”⁷

Similarly, the accreditation associations do not publish any rankings of institutions; nor do they evaluate individual programs and departments. (As observed above, the accreditation system does not attempt to gauge academic quality directly, but only judges institutions as either acceptable or not acceptable based on inputs and processes.) For many prospective students, knowledge about the quality of the department in the field they intend to major in is more useful than knowing that the school as a whole has satisfied a set of obscure criteria to earn accreditation. But the accreditation system does not provide such information. It is possible for a college or university to be accredited and yet have one or more academic departments that are weak and ineffective; that fact, however, even if it were noticed by the accrediting team, would not generally be available to the public.

Another drawback to the usefulness of accreditation is the fact that there is a high degree of collegiality in the process. The accreditation teams that visit and evaluate schools are not drawn from independent experts, but instead are generally composed of college and university personnel from other schools in the region, people whose own schools will be evaluated by a team that might include someone from the school

under evaluation. Greenberg observes that the accreditation system “is premised upon collegiality and assistance, rather than requirements that institutions meet certain standards (with public announcements when they don’t.)”⁸ It is not surprising that this system produces little valuable information because the accreditation agencies do not see themselves in an adversarial role with respect to their member institutions. The reports written by the accreditation teams are often loaded with polite statements of the obvious such as “The College should review space assignments and relate space allocations to current and future college needs,” and “It will also be important for the College to develop a plan to address esthetic/appearance issues recognizing the impact ‘first impressions’ have on potential students, employees, and benefactors.”⁹

If it were the case that the accreditation system served to maintain generally high educational standards, the fact that it does not also help in the evaluation of the comparative strengths and weaknesses of institutions would not matter. It has not, however, served to maintain generally high educational standards. As we will see in the next section, observers of American higher education have noted a serious falling in quality, particularly over the last thirty years. Although the accreditation associations are not responsible for the trend toward educational consumerism that has so eroded academic standards at many institutions, their required self-studies, campus visits, and standards have proven to be ineffective restraints against that trend.

Accreditors assert that it is valuable for colleges and universities to go through the self-study process. There may be some value in the exercise, but as a simple matter of self-interest, virtually all institutions, from businesses to hospitals to social clubs, evaluate themselves on a regular basis without any element of compulsion. Colleges and universities operate in a competitive market and would engage in self-studies and contract with outside consultants whenever necessary in order to remain competitive. The accreditation process thus requires schools to do what most would do anyway, at considerable expense and with little added benefit. As UCLA associate vice chancellor Paula Lutomirski said

about that school's self-study, "We produced this two-inch-thick document, and I don't even have it on my shelf, because it's not worth having."¹⁰

The accreditation associations sometimes provide their members with valuable counsel, but they are not the only sources of expertise in higher education. Most colleges and universities are quite happy to see the end of the accreditation visits and give little thought to their association until they must go through the process again. Benefits from the accreditation system—aside from its control over eligibility for federal funds—appear to be minimal and it is difficult to see how the once-in-a-decade accreditation review adds anything to the constant incentive for evaluation, both internal and external, that attracting students, retaining faculty, and competing with peer institutions provides.

It has been half a century since the federal government intervened to make accreditation almost obligatory for institutions of higher education. We do not know how the accreditation system would have evolved if it had not been for that intervention. It is clear, however, that the relationship between accreditation associations and colleges and universities is not a typical kind of business relationship. In the business world—including the field of education—there are firms that provide consulting services aimed at keeping quality and efficiency high. They sell their services in competition with other such firms, always needing to convince clients that their services are worth more than they cost. Contractual relationships between enterprises and independent consultants who help to maintain quality and efficiency are very common, but it is difficult to think of any other field in which enterprises rely on a membership association to maintain quality and efficiency.

That suggests that accrediting agencies might undergo dramatic change or disappear entirely if it were not for the federal law that guarantees them a customer base. We will explore in Section V how subjecting the accreditation associations to marketplace competition would lead to better results.

II. Accreditation and Educational Quality

Here we examine the crucial question of the connection, if any, between the accreditation process and educational quality. Our overall finding is that accreditation does not guarantee educational quality. Accredited institutions offer courses and even degrees that give little educational value and have allowed academic standards to sink while turning a blind eye to grade inflation. The accrediting system has not and probably *could not* act as a bulwark against the trends in academe that have been lowering its quality.

Despite the fact that virtually all colleges and universities in the United States are accredited (sometimes by more than one accrediting body), employers often complain that the college graduates they hire have little proficiency in the most fundamental skills—the ability to write clearly, to understand written instructions, and to do simple math, for example. Indiana University professor Murray Sperber writes that “many undergraduates currently receive educations of no use to them and their future employers.”¹¹ Sperber quotes John Chambers, CEO of Cisco Systems, as saying that, “If universities don’t reinvent their curriculum ... many students ... will ‘go to school’ on-line.”¹² Many large firms, Chambers notes, have already started their own on-line academies. We hold no brief for the notion that schools, including colleges and universities, should be training facilities for the business sector, but well-educated liberal arts graduates have time and time again shown themselves to be adaptable to a vast array of work situations. The trouble is that we are graduating fewer and fewer well-educated students, no matter what their field of study.

If accreditation ensured educational quality and upheld at least reasonable standards, we would not hear about graduates who can hardly read their own diplomas or calculate a percentage. The reason why some students graduate with such scant educational benefit from accredited institutions is that the accreditation process focuses on the educational inputs, rather than on the outputs—student learning.

Finding: The accreditation process focuses on compliance with a set of input criteria that do not bear directly on student learning.

When a college or university seeks accreditation or reaccreditation, the accrediting association to which it applies requires that it submit to an examination that amounts to a lengthy checklist of inputs. Does it have a mission statement? Faculty senate? Program review procedures? Sufficient library? Professors with “proper” credentials? Adequate financing? Those are the kinds of questions that occupy the accreditors. As Malcolm Gillis, president of Rice University says, “The accreditors are not interested in what or how the students learn, but how many square feet of classroom space we have per student.”¹³

If an institution shows the accrediting body that it has all the right inputs and has gone through the right procedures, it passes the review and receives its accreditation. Parents, students and citizens may assume that accreditation ensures good educational quality, but quality is not what the process measures. Accreditation only shows that the school is following what the accreditors think is the proper *formula* for a successful educational institution, not that it *is in fact* a successful educational institution. Nothing in the accreditation process measures student achievement to see whether students have made intellectual progress since high school or have attained a level of basic knowledge and competence that would be expected of college graduates.

Instead of implementing programs to assess student learning, the accrediting associations have been content to exhort colleges and universities to devise means of assessing their “institutional effectiveness.” The accreditors do not define institutional effectiveness, but their stan-

standards express the expectation that schools will develop ways to assess their own effectiveness, including student learning outcomes. Schools therefore can satisfy the accreditation criteria by merely showing that they have adopted some program to assess their "effectiveness," without any independent verification that the program actually works and adequately measures the educational impact of the school.

One accreditor's criteria state that, "Educational quality will be judged finally by how effectively the institution achieves *its established goals*." (Emphasis added.)¹⁴ That means a school with low, mediocre, or eccentric goals could be judged to be of acceptable educational quality so long as the school was meeting those goals. In fact, when a school of astrology was accredited (although not by one of the regional associations), the president of the Council on Higher Education Accreditation defended the move on the grounds that the accreditation of the school merely demonstrated that it appeared capable of meeting its goals of instructing students in astrology.¹⁵ Simply meeting one's own goals is not equivalent to an objective demonstration of educational quality.

Another accreditor's standards require that schools' mission statements include the "basic aims of higher education" including introducing students to general and specialized knowledge, increasing their interest in intellectual matters, enriching their cultural lives, and encouraging the pursuit of lifelong learning, among other things.¹⁶ It is easy for an institution to say that it pursues those aims and quite another to demonstrate that it succeeds. Accreditation ensures that schools will pay lip-service to sound educational goals, but not that they actually deliver a good education to their students.

Although virtually every school makes a public commitment to academic excellence, many fail to define exactly what they mean by it. For example, in 1999, Virginia completed a study of general education requirements at 66 public and private institutions in the state, including the 15 four-year public colleges and universities. The director of the State Council for Higher Education observed that while the schools all expressed their commitment generally to educational excellence and

student learning, almost 70% of the public institutions and over 80% of the private ones did not specifically define what they meant by “an educated person.”¹⁷ Nevertheless, all the schools were accredited.

A further difficulty with using accreditation as a proxy for high or at least acceptable academic quality is the fact that accrediting cycles are too long to allow people to say with confidence that an accredited institution is still one of quality, assuming it was to begin with. Typically, schools go through the accreditation process every ten years, and the accrediting team spends only a short time on campus. As one observer asks, “How can teams of 8 to 20 people (depending on the region) visit a large, complex institution every 10 years for two days of campus interviews and assure that those universities are properly accountable?”¹⁸

Finally, despite the large number of college graduates whose knowledge and skills are minimal, one looks in vain for instances where accreditation has been denied because of low educational value to students. It is exceptionally rare for an institution to lose its accreditation or to be placed on probation, and in those few instances, the reason is usually that it is in financial difficulty or is suffering from internal disruption. Colleges and universities simply do not lose their accreditation because of a judgment by the accreditors that the curriculum is weak, the faculty poor and the students don’t learn much. David Justice, dean of DePaul University’s School for New Learning says, “The truth of the matter is that regional accrediting associations aren’t very good about sanctioning an institution for poor quality.”¹⁹

In fact, accreditors themselves concede that accreditation is not necessarily a guarantee of educational quality throughout a college or university. One accrediting association states, “Meeting the standards does not guarantee the quality of individual programs, courses, or graduates, but serious weakness in a particular area may threaten the institution’s accreditation.”²⁰ Another offers the *caveat* that, “Institutional accreditation by the Commission testifies to an institution’s ... general quality ... but not necessarily to the merit of each specific individual program or compo-

ment within the institution.”²¹ That admission is extremely important. If the accreditation system does not even attempt to examine the educational quality of individual programs, what ground is there for assuming the “general quality” of the institution from its ability to satisfy a set of standards that are by themselves neither necessary nor sufficient criteria for a good educational experience?

The accreditors maintain that their criteria are necessary to achieving institutional quality, but even if adherence to all of them is *necessary* in order for a college or university to provide students with a good education, it does not follow that adherence to them is *sufficient* to do so. To use an analogy, suppose that an agency (governmental or private) were charged with certifying the reliability of automobiles, and drew up a list of essential parts (steering wheel, gas pedal, mirrors, etc.) and company policies (employee grievance procedures, non-discrimination statement, internal audits, etc.), and pronounced the firm “approved” if everything checked out. One would no doubt think that a poor substitute for actually testing vehicles to make sure that they ran well. Automobile buyers would not assume that a car was a good one just because the company that built it conformed to a list of input criteria. The accreditation system, unfortunately, doesn’t tell us any more about educational results for students than that hypothetical system of car evaluation would tell us about the quality of cars.

Hospital accreditation, which works in fundamentally the same way as does educational accrediting, has come under attack for the same reason discussed above—reliance upon structures and processes rather than performance measures.²²

Recently, the accrediting associations have begun to pay more attention than previously to the quality of instruction and student achievement. The Western Association, for example, instituted in the fall of 2000 a new standard stating, “The institution’s expectations for learning and student attainment are developed and widely shared ... The institution’s faculty takes collective responsibility for establishing, reviewing, fostering, and demonstrating the attainment of these expectations.”²³ Writing new standards that admonish colleges and universities to take student

learning more seriously is not, however, apt to bring about any improvement in educational quality.

The accreditors are not going to monitor student achievement themselves. Instead, they are establishing standards that call upon their member schools to pay attention to student achievement, as in the above instance, by ensuring that “expectations for learning and student attainment are developed and widely shared.” The difficulty with reliance on schools themselves to police educational quality is that they have a strong incentive to make themselves look good to accreditors (and other outside observers), while offering the kind of easy, entertaining courses that many students expect and even demand. Schools will comply with whatever standards the accreditors may write regarding student achievement, while at the same time continuing to offer the sort of easy-going courses that satisfy most students.²⁴

Sperber, among others, has written about what he calls the “faculty-student non-aggression pact”: faculty members who want to maximize their time for research (or other activities) implicitly agree not to demand much of students and give high grades, and the students implicitly agree not to complain about the shortage of real education. He quotes a University of Missouri student whose attitude is commonplace, “Most students here, except for the journalism majors, feel they don’t need to try hard [in classes] and they can get by and get their degree. You find that out when you walk into your first class here. ... Most Mizzou students are satisfied with easy schoolwork because other things are much more important to them, mostly partying and following the Tigers.”²⁵

Many colleges and universities today depend on large numbers of “disengaged students,” as Professor Paul Trout terms them,²⁶ to fill up their ranks. Those students readily embrace the “non-aggression pact” and revolt against academic rigor when professors attempt to impose it. For schools to require high academic standards and evidence of achievement before students could graduate would bring about a significant enrollment decline. The economic need to keep students content so

that their payments will continue is of paramount concern at most schools. If accreditors push the schools to institute programs to assess students' achievements, the result at many institutions would be academic "Potemkin Villages" created to give the impression of academic success (as defined by the school) but without substance.

Thus, the accreditation agencies cannot really be faulted for failing to require respectable academic standards. They are not in a position to override the decision of large numbers of institutions to trade off academic quality for high enrollments. But we ought to look askance at the perceived notion that there is a connection between accreditation and educational quality. At one time, accreditation may have been a good indicator of educational quality, but today even the "minimum standards" it purports to guarantee are far from sufficient to ensure that students receive anything worthy of being called a college education.

Finding: Accreditation standards fail to recognize a crucial component of a quality education—sound general education requirements.

The heart of undergraduate education is the school's core curriculum—the courses required for graduation for all students. The core curriculum provides the general education that helps to make a well-rounded, broadly educated individual. Yet general education requirements—part of the cement that binds our citizenry together—have eroded very badly at many accredited colleges and universities.

Many experts have stressed the importance of a strong core curriculum. "The purpose of general-education requirements is to ensure that every student is given a firm grounding in the essential areas of knowledge that he or she will use for a lifetime. ... They prepare an individual both to earn a living and to live a life. And they provide the store of common knowledge that prepares us for citizenship and participation in our democracy."²⁷

For the greater part of the 20th century, America's leading colleges and universities were strongly committed to providing undergraduates with

a broad and rigorous exposure to the major areas of knowledge. Traditionally, that meant highly structured courses required of all students to familiarize them with a wide range of subjects in the humanities, social sciences, and natural sciences including the history of their country and the world at large; an exposure to major philosophical, literary, religious, and political traditions; an understanding of the natural sciences including mathematics; the study of a foreign language; and an ability to think, speak, and write with clarity and purpose.

The importance of general education in the undergraduate curriculum is underscored by the fact that all of the regional accreditors make it a condition of eligibility for accreditation that an institution have an acceptable general education component in its curriculum. However, studies in many states have found the core curriculum in serious decay.²⁸ A 1996 study conducted by the National Association of Scholars concluded that:

[D]uring the last thirty years the general education programs of most of our best institutions have ceased to demand that students become familiar with the basic facts of their country's history, political and economic systems, philosophic traditions, and literary and artistic legacies that were once conveyed through mandated and preferred survey courses. Nor do they, as thoroughly as they did for most of the earlier part of the century, require that students familiarize themselves with the natural sciences and mathematics. ...²⁹

Although the regional accreditors have standards for general education, they are quite vague about what subjects should be included. For example, the Middle States Association says that, "The kinds of courses and other educational experiences that should be included in general education are those which enhance the total intellectual growth of students, draw them into important new areas of intellectual experience, expand cultural awareness, and prepare them to make enlightened judgments outside as well as within their specialty."³⁰ That gives colleges *carte blanche* in setting their general education requirements.

The idea of a core curriculum has been undermined at many colleges and universities by the “distribution requirements” approach. That means that students do not have to take a set of required courses, but must only select a course or two in a variety of departments. At the University of Minnesota, for example, students must take courses in English composition, literature, history, math, and science. (Note the absence of any requirement in philosophy, foreign language, or the fine arts.) But the literature requirement can be satisfied by any of a great array of courses, including “Contemporary Women’s Fiction,” “Quebec: Literature and Film in Translation,” and “The Grimms’ Fairy Tales, Feminism and Folklore.” The history requirement can be satisfied by such courses as “Sexualities: From Perversity to Diversity,” “History of Visual Communication,” and “Gay Men and Homophobia in American Culture.”³¹ The “distribution requirements” approach often leads to a very scattered and ineffective learning experience, as students choose courses in the required subject areas without rhyme or reason. Once the “distribution requirements” approach takes hold, the idea that students should all partake of a broad, *general* education departs.

Accrediting standards pay lip service to the core curriculum concept. For example, the North Central Association’s criteria state that every school’s undergraduate degree program must include “a coherent general education requirement consistent with the institution’s mission and designed to ensure breadth of knowledge and to promote intellectual inquiry.”³² If colleges and universities were really held to that standard and *required* that students pass a core curriculum ensuring them a breadth of foundational knowledge, there would be no ground for criticism. The truth, however, is that schools can retain their accreditation even though allowing students the latitude to enroll in almost any courses they want.

Students should have some freedom to choose the courses they want to take, but if the accreditors were vigilant in policing educational quality, they would insist that students take *fundamental* courses before going on to very narrow ones. Instead, schools can get by with the “distribution requirements” approach that permits students to graduate without

having taken anything approaching a core curriculum that ensures them a “breadth of knowledge.” Insofar as a broad-based education is an important component of a quality college education, the accreditation system has failed to guarantee quality.

Finding: Accrediting standards can actually undermine colleges’ institutional missions and subordinate academic goals to non-academic considerations.

Accreditors sometimes apply recipes for educational inputs that result in misallocated resources or even undermine educational outcomes. For example, some accreditors have demanded low faculty teaching loads. Campbell University in North Carolina was placed on probation because its standard faculty teaching load was 15 hours per week. The accreditor insisted that 12 hours was the maximum acceptable load, so the school solved the problem by consolidating class sections. Instead of the relatively small classes the students had expected, especially in freshman and sophomore courses, after the accreditation visit students often found themselves in classes of sixty or more. The assumption behind the accrediting standard was that educational quality is enhanced by having lower faculty teaching loads, but in this case, the result of enforcing the standard was student dissatisfaction because their educational experience was degraded.³³

Accreditors’ recipe for educational inputs also often includes the idea that colleges should employ only individuals holding certain credentials. Standards call for the employment of individuals holding the accreditors’ idea of “appropriate degrees” in the fields in which they teach. The Southern Association, for example, states that faculty teaching general education courses at the undergraduate level are expected to have at least a master’s degree with a minimum of 18 graduate semester hours in the discipline taught.³⁴ The underlying assumption is that good professors are those with the right scholarly credentials—another case of looking at inputs rather than outputs—and that people who don’t have those credentials should not teach.

The difficulty with the standard is that it rules out the employment of individuals who may be very knowledgeable in a field and perfectly capable of teaching it, but who don't possess the prescribed credentials. People can and do gain knowledge outside of graduate schools. Some best-selling historians do not have advanced degrees but would be wonderful history instructors. Many writers are good at teaching literature, regardless of their credentials. There are exemplary economists who never earned a Ph.D. in economics. Following accreditors' imperatives, schools are encouraged to rank the possession of certain credentials above other aspects of individual ability and achievement. Restricting hiring to individuals with certain credentials may not lead to better teaching, but will tend to drive up costs.

Driving up costs or reallocating (or misallocating) institutional resources may be one consequence of accreditors' misplaced priorities. Peter Magrath, president of the National Association of State Universities and Land-Grant Colleges, recounts an episode from his tenure as president of the University of Missouri, when the accreditation committee of the American Bar Association insisted that the university's law school needed a new building. "The problem," Magrath wrote, "was that you had people making decisions about the use of university resources who didn't have an overall perspective."³⁵ Accreditors certainly mean well with standards designed to promote quality, but forget that there are inevitable trade-offs and complexities that they cannot see.

Sometimes accreditors insist that the college's academic goals be subordinated to the accreditors' own social vision. Several of the accrediting associations have chosen to include among their standards a requirement that colleges and universities admit students and hire faculty and other personnel on the basis of race and other demographic characteristics. This requirement seeks to impose on every college a particular social policy that is controversial, indeed sometimes illegal, and may contradict the mission of some colleges.

A related requirement is that colleges change their curricula to reflect topics and materials presumed to be of interest to or relevant to certain

racial and other demographic groups. Once more, the assumptions behind this view are controversial and may not be suited to the mission of some colleges. For accreditors to require a college to change its educational philosophy and alter the content of its courses is difficult to reconcile with academic freedom and the diversity of institutions.

Some educators have argued that demographic representation is a part of educational quality.³⁶ Others have responded that decisions based on criteria other than excellence and merit are detrimental to educational quality.³⁷ It is questionable for accrediting associations to attempt to force colleges to implement a controversial social policy about which men and women of good will have legitimate philosophical differences.

Some educational leaders have even had to face the prospect of incompatibility between accrediting standards and the very nature of their institutions. In the best-publicized instance of such conflict, Thomas Aquinas College was threatened with a loss of accreditation due to the fact that its avowedly Catholic, traditional orientation had no room for the multicultural courses that its accreditor, the Western Association of Schools and Colleges, was prescribing at the time (1992). The “Great Books” curriculum at Thomas Aquinas was the very key to the school’s mission—so much so that there were no elective courses at all. Instead of acceding to Western’s standards and introducing new courses that would not fit in with the philosophy of the school, president Thomas Dillon chose to complain that, “In the name of advancing diversity within each institution, [proponents of diversity] are imposing their own version of conformity and threatening true diversity among institutions.”³⁸ He further observed that “Advocates of diversity and multicultural standards will be pitted against institutions striving to preserve high academic standards along with their own distinctive missions.”³⁹

The WASC standards that threatened the small Thomas Aquinas College were also unacceptable to several of the most prestigious universities in California. The standards were denounced by, among others, president Gerhard Casper of Stanford, who said that such tight accrediting controls “would ruin a system of higher education that allows Stanford and Thomas Aquinas College to serve students of different tastes.”⁴⁰ In a let-

ter to WASC, Casper argued that the commission was “attempting to insert itself in an area in which it has no legitimate standing.”⁴¹ In the face of such criticism, WASC subsequently voted to soften, but not eliminate, the controversial standards.

In the 1990s, controversy over the use of accrediting standards requiring schools to become more diverse in student body, faculty and curriculum reached its apex. The Middle States Association had threatened to withdraw accreditation from two schools because, in one case (Baruch College), the school had only 18% minority representation on the faculty, and in the other (Westminster Seminary), the school did not have any women on its governing board. Education Secretary Lamar Alexander concluded that it was not appropriate for an accreditation agency to wield what amounted to federal power in a manner that threatened academic freedom and diversity among institutions.⁴² Writing that “I did not know that it was the job of an accrediting agency to define for a university what its diversity ought to be,”⁴³ Secretary Alexander chose to defer recognition of Middle States pending a report from the Education Department’s Advisory Committee on Accreditation. The chairman of the committee, Professor Martin Trow, asked, “Who sets the agenda on the campus? The accrediting agency may be coming on campus as one of the contending forces.”⁴⁴ The committee recommended that Middle States’ recognition be extended for one year provided that it not deny accreditation to any institution based on diversity issues. Subsequently, Middle States voted to soften its standards, allowing member schools to pursue diversity as they think best.

It appears that the regional accrediting associations have backed away from the vigorous promotion of demographic standards, as cases where schools have had their accreditation threatened for failing to conform to such standards have not come to public attention in recent years. Some accreditors, however, continue to make “recommendations” that schools “improve” their faculty demographics, for example.⁴⁵ Administrators are loath to disregard completely such “recommendations.” Moreover, accreditors remain free to return to the practice of conditioning accreditation on conformity to demographic standards, or to adopt other controversial standards in the future.

III. Accreditation and the Cost of Higher Education

There is great concern among the public over the steadily rising cost of higher education. Since 1980-81, college tuition on average has more than doubled, increasing by 110% after adjusting for inflation. During that same time period, the median inflation-adjusted income for those families most likely to have children in college rose only 22%. The share of family income required to pay for college expenses has increased for all families, but has gone up the most for low- and moderate-income families.⁴⁶

The College Board estimates for the 2000-01 school year, the average undergraduate budget for total expenses was \$11,338 for a four-year public college or university and \$24,946 for a four-year private college or university.⁴⁷

Governmental student aid programs have increased in value, but not enough to keep pace with the rise in costs. (Some observers contend that the more generous the student aid programs become, the more colleges and universities increase tuition.)

The divergence between the cost of higher education and the ability of families to afford it has led to increasing debt burdens for graduates. On average, graduates of colleges and universities leave school with debts of more than \$13,000.⁴⁸ Terry Hartle of the American Council on Education says that, "Remaining affordable for middle-class parents is the 800-lb. gorilla facing colleges and universities."⁴⁹

In fact, Americans may be paying more for higher education, but getting less of it. Not only has tuition risen faster than personal and family income, but gross tuition costs appear to have increased much more rapidly than the cost of providing instruction to students.⁵⁰ One reason is that professors, whose compensation has increased substantially over the last two decades, now spend fewer hours teaching than before. In the 1990s, the average teaching load for professors shrank from 12 to 6 hours per week, and the length of the school year shortened from 17 to 15 weeks per semester.⁵¹

■ *Accreditation and Costs*

The accreditation associations do not include affordability or educational value among their goals. They have always left those concerns to parents and taxpayers. Accreditation is never lost or even questioned because of high expenditures on buildings, personnel or programs that have questionable educational benefit.

Lack of concern over costs by the accreditors might be overlooked if it were not for the fact that their standards often encourage colleges and universities to spend money on inputs that may not be necessary. In its 1998 report to Congress, the National Commission on the Cost of Higher Education noted that accreditation bodies “have been inclined to emphasize traditional resource measures as proxies for quality.”⁵² Such measures—the number and reputation of the faculty, the range of curricular offerings, the number of books held by the library, the size of the school’s endowment, the extent of recreational and support services for students, among others—are difficult to link to demonstrated student achievement. Spending on those inputs is neither necessary (students who have gone to very resource-poor schools have had excellent learning experiences) nor sufficient (students have graduated from resource-rich schools with very little to show for it) for a solid education.

Accreditation has an intangible cost for colleges and universities—the requirement for them to conform to the standards set in the accredita-

tion standards. On the one hand, conformity may be regarded as beneficial in that institutions cannot deviate far from the generally accepted formula for a good school. On the other hand, having to conform to the accreditors' model may inhibit managerial flexibility and drive up costs. Having to meet a standard for library size, for example, may do nothing to help students learn, but will divert resources from other institutional needs that the school may regard as more pressing. The foregone value as a result of devoting limited funds to less-valued uses is a cost of the accreditation system.

Antioch University chancellor Alan E. Guskin explains another way that the use of resource measures to define college quality merely increases costs. Guskin writes that, "It is these definitions of quality that have led to ... the proliferation of disciplinary programs based on the interests of faculty members and to the significant increase in expenses for student support services. ... We are so wedded to a definition of quality based on resources that we find it extremely difficult to deal with the *results* of our work, namely student learning."⁵³

Moreover, there are direct costs to colleges and universities of the accreditation system. The regional accreditors charge schools for conducting campus visits and reviews of the self-study documents. A survey conducted by the Council for Higher Education Accreditation in 1997 asked colleges and universities about the cost of the process. More than 600 institutions responded. The study found these cost categories in the accreditation process:

- **Fees for campus visits.** The fees ranged from \$1,000 per visit to \$5,000 per visit.
- **Direct and in-kind expenditures.** Schools were asked to estimate how much time they had spent on direct and in-kind expenditures (staff time, supplies and materials, etc.) during their most recent accreditation review. The average total expenditure by public four-year institutions was \$63,000, with more than 20% indicating that they had spent \$100,000 or more.⁵⁴

The report accompanying the survey results noted that, “[t]here were a large number of negative opinions voiced about accreditation and the accreditation process by survey respondents. The comments covered such areas as the high cost and time consuming nature of the accreditation process, subjective and punitive behavior exhibited by accreditors ... and the lack of coordination and consistent standards among and between regional and specialized accreditors.”⁵⁵

Accreditors have a tendency to recommend actions by schools that will require them to use scarce resources to little or no purpose. For example, accreditation teams have a predilection for recommending ever more planning by schools. A university may have various safety plans, for example, for its different campuses and segments, but accreditation teams are apt to recommend that “a comprehensive safety plan be developed, implemented, and evaluated regularly.”⁵⁶ Accreditor recommendations on planning and other subjects often are made without realizing that accreditation teams are not well placed to see the totality of costs and benefits.

Among the recommendations of the National Commission on the Cost of Higher Education was that accreditors and member schools should devise standards and review processes “that support greater institutional productivity, efficiency, and cost constraint,” thus recognizing that the accreditation system has not been concerned with the problem of escalating costs in higher education. In fact, as we have seen, the system can exacerbate the cost problem by encouraging expenditures that have lower educational value than those that would have been undertaken. Former Rhodes College president James Daughdrill summed up the view of many college administrators when he said that accreditation is “an exercise in wasted time and money.”⁵⁷

IV. Legal Issues in the Accreditation System

In addition to the problems and inefficiencies of our system of accreditation for colleges and universities discussed in the previous chapters, there are a number of serious legal questions about it as well.

■ *Delegation of Authority to Non-governmental Bodies*

In establishing the federal programs for student financial assistance, Congress chose not to have the government decide which educational institutions would be eligible to receive those funds. Traditionally, the federal government has taken a “hands-off” role with regard to higher education as it is not listed as a subject of federal power in the Constitution. Fearing a backlash from the education community if the government set standards for colleges and universities, Congress decided to delegate the responsibility for the setting of eligibility requirements to the regional accrediting associations.

That raises a constitutional issue. Article I, section 1 states, “All legislative Powers herein granted shall be vested in a Congress. ...” The legislative powers conferred in Article I include both the making of laws and the appropriation of money, with the constitutional text specifying the precise objects over which Congress has authority to make law and authority to spend tax money. The language does *not* give Congress authority to delegate its powers—either to other governmental bodies or to non-governmental bodies.

There has been considerable litigation over the delegation of legislative power. For example, in the 1921 case *United States v. L. Cohen Grocery Co.*, the Supreme Court struck down a statute that made it a federal

offense to charge prices that were “unjust or unreasonable” on the ground that in passing the statute, Congress had unconstitutionally delegated its legislative authority to the courts, since it was they that would decide whether any charged price was “unjust or unreasonable.”⁵⁸ The Constitution intended that lawmaking be done by the elected members of Congress, not the unelected members of the judicial branch.

Several of the key New Deal cases revolved around the delegation issue. One of the most prominent pieces of legislation in the early New Deal was the National Industrial Recovery Act, which empowered the President to enforce industrial codes covering pricing, terms of labor and other aspects of the production and sale of goods. The codes were formulated by industry groups, and deviations from them were prosecuted by the federal government’s National Recovery Administration. This scheme was struck down in 1935 by a unanimous Supreme Court on the grounds that Congress had illegally delegated its authority.⁵⁹

Later in the New Deal, the Supreme Court softened its stance against delegation, holding that it was not impermissible for Congress to delegate lawmaking authority so long as its statutes specified the goals that the agency was supposed to attain in its rulemaking. The Court reasoned that democracy was preserved as long as elected representatives set general parameters for the agency and held powers of oversight. Accordingly, congressional enactments that delegate authority now follow a pattern of reciting the goals to be accomplished and guidelines to be followed. Legal commentators have argued that this approach is little more than a fig leaf over the delegation problem, since the guidelines given are often so vague as to be of no practical help and that congressional oversight is often nonexistent.⁶⁰

The problem with the delegation of authority in accreditation is novel in two respects. First, it deals not with rulemaking, but with expenditures. Second, it confers power not on a governmental agency, but on a private organization. The courts have yet to address those issues. While there appear to be no cases on point, the authors are unaware of any other federal program where eligibility for the receipt of government

funds is conditioned on approval from a *private* organization. The argument that the courts have accepted with regard to delegation of authority to governmental agencies is that they are subject to the control of Congress. That is not the case with the regional accreditation associations, which are private organizations. And although Congress has laid down guidelines that the Department of Education is to adhere to in deciding which accreditors it "recognizes," those guidelines are vague when it comes to specifying how the Department is to evaluate the work of the accreditors. In point of fact, congressional oversight has been minimal.

Again, there appear to be no cases that have challenged the constitutionality of the delegation of authority to private accrediting associations, but such a challenge would not be without grounds.

■ *Possible Conflicts of Interest*

Another difficulty with the delegation of power to regional accreditation associations to decide which institutions are "good enough" to receive federal student aid funds is that there may be conflicts of interest in making those decisions.

The educational institutions that the accreditors evaluate are (or in the case of new institutions, want to become) members of the accreditation association, paying annual dues to it. That raises a conflict of interest. The association itself benefits from a decision to accredit a school, thus inducing a bias in favor of granting accreditation. The fact that accreditation is rarely denied or revoked may be explained, at least in part, due to the reluctance of the accreditors to cast off paying members.

Moreover, the accreditation review process contains the appearance of a conflict of interest. The individuals who participate in the evaluation of a college or university are largely drawn from the ranks of the faculty and administration of other institutions in the same region. Knowing that members of the faculty and administration of the school under review may at some future point participate in an evaluation of the evaluator's school, there may be a tendency to go easy on criticism and to

refrain from sharp actions such as revocation, suspension or denial of accreditation.

The desire to maintain collegiality and not to lose paying association members raises conflict of interest issues that make the regional accreditors questionable choices to be the gatekeepers of eligibility for federal funds.

V. Recommendations

The system of accreditation that has evolved in the United States, we have seen, does not serve to assure educational excellence or even competence. With accreditation almost universal, it does little or nothing to screen out institutions that have succumbed to the temptation to keep students content with low standards and a weak curriculum. Accordingly, actions should be taken by people at several different levels.

■ *Parents and Students*

The accreditation system provides little usable information for parents and students who are considering colleges and universities. The accreditors keep their reviews of member schools confidential. Since schools don't usually release critical accreditation reviews, parents and students do not benefit from whatever insights into institutional weakness the accreditation process might uncover.

Parents and students should bear in mind that accreditation is no guarantee of educational quality, and conversely that lack of accreditation (or suspension thereof) does not necessarily indicate that the institution fails to provide a sound educational environment. At the present time, almost all colleges and universities are accredited, but that may change in the future and if so, parents and students should consider colleges and universities without regard to accreditation status. In this regard, it is worth noting that there are non-accredited professional schools that have a record of success. In California, for example, there are several non-accredited law schools. Although those schools don't attract as high a caliber of student as the accredited schools do, they have a reasonably high passage rate on the state bar exam. Lack of accredited status does not necessarily mean that an institution is lacking in educational capability.

Finally, there is no reason why accreditation must remain an irrelevancy to parents and students. They can and should let their elected representatives know that they want an accrediting system that gives them information about schools' educational outputs, not just their inputs.

■ Trustees

Often, trustees are only vaguely informed that their college or university is going to go through the accreditation process. After the review has been completed, the trustees receive a copy of the report as a *fait accompli*. They are sometimes told that major allocations of resources or revisions of policy must be made because the accreditors demand them. The board should not allow its governance authority to be overriden in this way.

In fact, accreditors may only be reflecting ideas injected into the process by campus administrators themselves. Some trustees suspect that they are being manipulated by a process in which they have little or no opportunity to participate. It need not be that way.

Trustees should be deeply involved in the accrediting process from the beginning. The first question should be whether to participate in accreditation at all. That question is almost never asked these days, since most schools assume that loss of accreditation would mean a) a severe blow to their reputation, and b) the loss of many students who depend on federal student aid programs. Those assumptions are open to question. First, there is little reason to believe that a lack of accreditation would cause students and parents, who are looking for educational quality, to disregard the accumulated experience of alumni and employers that the school's programs are good. This is true especially since accreditation seems to play an extremely small role in the evaluation process of people who are looking for a college or university.

Second, it may or may not be the case that the loss of students with financial aid would be a disaster. Two colleges of note—Hillsdale and Grove City—have taken the step of refusing all federal assistance in order to remain free of the many strings that come attached to such

funds. Both have found means of assisting students who would not otherwise be able to attend. And with more and more families setting aside money in various savings programs to pay for college expenses, the degree of dependence upon governmental loans and grants will probably fall in the future. Therefore, the assumption that loss of accreditation would mean an irreplaceable loss of revenues may be incorrect.

The second question that should be before the board—and not pre-empted by the administration—is what accrediting agency to use. Historically, the accrediting associations have operated only in specific regions of the country, in effect dividing the market geographically. No law prohibits a school from seeking accreditation from an accrediting association other than the one that has traditionally served its region. Any school could send out requests for bids for accreditation services. Doing so might lead to lower costs and a more businesslike relationship with the accreditor. And for liberal arts colleges, there is presently one alternative to the regional accreditation cartel—the American Academy of Liberal Education (AALE). Founded in 1993, AALE is a federally recognized accrediting body that applies rigorous academic criteria to institutions seeking its accreditation. The board should consider its choice of accreditor as a business decision, trying to get the most service for the money.

The third imperative for the board is to participate in the accreditation process itself. The board should appoint a committee or task force to monitor the process and coordinate the board's participation in it. Accreditation offers a timely opportunity for defining the institution's mission and setting long-term goals. The "self-study" phase results in a diagnosis of the institution. The board should itself review and evaluate the self-study. It should both learn from it and add its own concerns to the diagnosis.

The self-study also includes goals and plans for the future. The board should not be a passive recipient of a completed report. The board should participate in a discussion of institutional strengths and weaknesses, and decide on major goals, early in the process. Ideally, it is the

goals defined by the board that will drive the self-study and other phases of the accrediting process.

Finally, the board should evaluate the accreditors' recommendations, not assume that they are holy writ. In almost all cases, the recommendations are advisory rather than mandatory. The board's accreditation committee should review the findings in detail and present its own analysis for the board's consideration.

■ *Accreditors*

At its inception, accreditation helped institutions by conveying important information about them to the public. The fact that a college or university had earned accredited status from one of the regional associations showed it to be an institution of high standards—similar to accountants who earned the C.P.A. designation.

Once a badge of distinction, accreditation has now become so commonplace as to be of negligible benefit to either educational consumers or the institutions themselves. Many colleges and universities continue to go through the motions of accreditation principally because they would lose access to federal student aid funds if they didn't. As Ralph Wolff of the Western Association of College and Schools has written, "Within academe, many large and selective institutions view accreditation by regionally based accrediting agencies as unnecessary and inconsequential."⁶¹

Just as inefficient trucking firms and airlines were caught napping by legal changes that brought unexpected competition to their industries, accreditation associations that do not plan for the possibility of the withdrawal of the federal law that guarantees their market may find themselves struggling to survive. A de-coupling of accreditation and eligibility for federal student aid funds was proposed in 1992 by the Secretary of Education and is a possibility in the future. If that were to happen, accreditation would have to pass the test of the market, forcing the accrediting bodies to compete in selling valuable services to colleges

and universities. The accreditors would be wise to begin preparing for that eventuality. Some of the changes they should make are:

- **Evaluate results, not inputs.** Just as there isn't one fixed and optimal means of providing other goods and services, there isn't one fixed and optimal way of providing education. In the past, accreditation has tended to focus chiefly on educational inputs, while paying little attention to the results for students. That approach has obscured the fact that educational standards have been in sharp decline at many colleges and universities. While, for reasons discussed above, it may not be possible for accreditors to insist on evidence of academic achievement for most or all students as a condition of accreditation, it should at least be possible for them to identify those schools where students only graduate if they have completed a serious course of study. Knowing which schools stand out for their continuing commitment to excellence would be valuable information for decision-makers.

Schools ought to receive praise for having instituted appropriate tests to show that their students have in fact made educational progress. How best to do that will not be the same for all schools, and suggesting the best means of assessment might become an area of expertise for accrediting agencies, much as energy consultants tell business clients not only whether they are using energy efficiently, but how to reach optimal efficiency.

- **Make information available to the public.** As things now stand, poor evaluations can be hidden. The historic collegiality between the accrediting associations and their members has resulted in a system that is virtually unknown to the public. Institutions would be more apt to prevent serious weaknesses, especially academic ones, from developing if they knew that they would be exposed to public scrutiny.
- **Don't just say yes or no, but evaluate.** The accreditation system works like a light switch—either it's on or it's off. With virtually

every institution of higher education accredited, it has almost no meaning except to satisfy the federal requirement for eligibility for student aid funds. Accreditors would greatly improve their worth to the public if they would delve into the strengths and weaknesses of colleges and universities rather than just scanning to make sure that they fit the general profile of acceptability. This is not to call for another "ranking" scheme, but only for the disclosure of pertinent facts and observations.

- **Drop political agendas.** Some of the accrediting associations have clearly adopted a political agenda and have tried to use their influence to require colleges and universities to adhere to it. Schools that do not want to conform to the idea that every aspect of campus life must be "diverse" should not be pressured to do so. Educational quality does not depend on having any particular mixture of people from different backgrounds on the faculty or in the student body, or on a curriculum that covers a wide array of topics that supposedly appeals to different groups. Indeed, such requirements may in fact reduce rather than enhance overall diversity.
- **Compete.** The traditional division of the country into regions that are the sole province of one accrediting association makes no sense today, if it ever did. Increasing competition is the norm in most facets of life and there is no reason why the field of academic accreditation would not benefit from it. The accreditation associations should announce their willingness to accept business from institutions that are not within "their" regions.
- **Give consideration to the cost of higher education.** Especially in the realm of public higher education, cost containment is a matter of great concern, not just to students and parents, but also to the taxpayers who provide much of the funding. Accreditors may well find that they can enhance their value to schools if they develop expertise in finding ways to contain or reduce costs. While campuses frequently have other consultants to help with, for example, energy costs, they might benefit from an accreditor's recommendations

on ways to reduce textbook costs, housing costs, or other things. Accreditors that can help to control costs will have a competitive advantage over those that can't.

■ *The States*

The fact that so many of America's colleges and universities are financed and run by state governments gives the states a great deal of leverage to push for changes in the accreditation system. States took the lead in making changes in our welfare system and could do so with regard to accreditation also.

One possibility would be for state legislatures to require that their universities adopt competitive bidding for accreditation services. It is of course possible that only the historic, regional accreditor would submit a bid, but competition is a powerful force. Even nonprofit institutions like to grow. The prospect of getting contracts may overcome traditional boundaries, and also bring new accreditors into the field.

An objection to requiring bidding might be that universities would then be able to seek out accreditors with low costs and low standards. This paper has argued, however, that accreditation standards have already fallen to the lowest common denominator and accomplish little to preserve academic quality. Instead of causing a "race to the bottom," competition in accreditation would or at least could do the opposite. Schools that wanted to differentiate themselves by virtue of their high standards, serious teaching, sound curriculum and so forth might find accreditors who were selective and whose accreditation would be a mark of distinction. Competition in this field can only lead to improvement.

The states could also seek federal waivers (as was done with regard to welfare reform) of the law requiring accreditation by a federally recognized accrediting agency, then devise their own mechanisms for ensuring the educational quality of their institutions.

■ *The Federal Government*

Accreditation arose as a voluntary means of providing educational consumers with a level of confidence that an accredited institution at least meets certain minimum standards. This study finds that accreditation as it is currently practiced does not ensure that institutions provide any more than minimum standards for institutional *inputs*—that is, standards for the framework in which education is provided. As for the institutional *output*—that is, how much educational value students derive—accreditation fails to provide any assurance that students will in fact learn much of consequence during their years in school.

The federal government should sever the connection between accreditation and eligibility for student financial aid. The reason for linking the two at the time of the GI Bill was to protect against the squandering of federal funds in institutions that provided an education in name only. The assumption was that accredited institutions were presumptively good schools and non-accredited ones were presumptively not. Experience has shown, however, that many *accredited* institutions now provide an education in name only and accreditation, therefore, is an unreliable guide to educational quality. If accreditation ever served as a reliable proxy for acceptable educational quality, it no longer does.

There is no reason to believe that students would waste their funds at institutions providing little or no educational benefit if they were free to enroll without regard to the accreditation status of a school. That is because students and parents always have a substantial personal cost in attending a school, even when receiving government aid, and want to get value for their time and money. Moreover, they have access to more information than ever before on the quality of education—books, magazines and especially on the internet—enabling them to make informed decisions based on far more than the minimal amount of information conveyed by the accreditation system. That is to say, the self-interest of students and parents reduces the problem of fraudulently low-quality education that the accreditation requirement was supposedly needed to prevent to one of *de minimis* proportions. If there were instances of

educational fraud by institutions receiving federal funds, it would be better policy to ban them from receiving federal funds for a period of years than to compel all to participate in an accreditation system that has, in the view of some observers, more cost than benefit to educational institutions. That is the approach the government takes with the Food Stamp program. Rather than trying to limit Food Stamp use to approved stores, the government looks for cases of fraud and prosecutes them.

If the federal government repealed the restriction against using student aid money at non-accredited colleges and universities, the accreditation system would no longer be guaranteed a market for its services. That would, first of all, remove its power over colleges and universities, power that has sometimes been abused in attempts to impose ideological conformity. It would also mean that accreditation would have to pass the test of the market—i.e., earn enough in voluntary payments to cover all of its costs of operation. Boston University president Jon Westling summed up the benefits of opening up a free market in accreditation:

Accreditation agencies should be, in effect, accredited by their customers. If they have anything worthwhile to offer colleges and universities, colleges and universities will pay them for it. Generally, colleges and universities will pay to be reviewed by the agency which has the strictest standards that the institution thinks it can pass. A free market in accreditation agencies will quickly stratify, with the toughest agencies attracting the best colleges and universities. The public will benefit from a genuine ranking system.⁶²

Conclusion

Accreditation of institutions of higher education in the United States began more than a century ago as a means of helping education consumers differentiate between those that evidenced a serious commitment to advanced learning and those that did not. Until 1952, accreditation was an entirely voluntary matter; most colleges and universities sought accreditation, but not all. After the passage of the 1952 Higher Education Act, however, students who qualified for federal funds were only allowed to use the funds if they attended an accredited college or university. Accreditation then took on a significance it had never before had—it was the gatekeeper for access to a large and growing amount of federal money.

Underlying the congressional decision to entrust the accreditors with the gatekeeping function was the assumption that accreditation was a reliable indicator of educational quality. One of the major findings of this report, however, is that today accreditation does not necessarily ensure that a college or university provides students with a sound or well-rounded education. The standards imposed by the accrediting associations focus on readily measured and observed inputs and processes. They do not endeavor to measure student learning, instructional quality, or academic standards. And while accrediting standards call for a strong core curriculum of general education courses, many schools now have a core curriculum in name only.

The accreditation system not only pays no attention to the cost of higher education, it adds to costs as well. Accrediting fees are not insignificant, but far more important are the costs to schools in terms of resources diverted to comply with accrediting requirements. There is no

competitive pressure on the accreditation agencies to keep costs down and render optimal service to their members because they operate as regional monopolies.

Congress should repeal the law that makes eligibility for federal student aid funds depend on the maintenance of accreditation. The states should require competitive bidding for accreditation services so long as they are thought desirable. Together, those policy changes would take away the captive market for accreditation and inject the element of competition. Accreditation would thus be put to the test of the market. and, if it survives, it would only do so by providing colleges and universities with valuable services that are worth what they cost.

Notes

1. Commission on Colleges, Southern Association of Colleges and Schools, *Principles of Accreditation*, approved December 11, 2001, <<http://www.sacscoc.org>>, p. 1.
2. See, for example, Middle States Commission on Higher Education, Middle States Association of Colleges and Schools, *Characteristics of Excellence in Higher Education: Standards of Accreditation*, 1994 ed., available on <<http://www.msache.org/pubs.html>>.
3. Robert Shaw, "A Backward Glance: To a Time before There was Accreditation," *NCA (North Central Association) Quarterly* 68, no. 2 (fall 1993): p. 334.
4. Ibid.
5. Jeffrey C. Martin, "Recent Developments Concerning Accrediting Agencies in Postsecondary Education," 57 *Law and Contemporary Problems*, no. 4 (autumn 1994): p. 139.
6. 20 USC Sec. 1099(b).
7. Milton Greenberg, "America's Colleges Should Rank Themselves," *Chronicle of Higher Education*, 16 June 2000.
8. Ibid.
9. Evaluation Team representing the Committee on Higher Education of the Middle States Association of Colleges and Schools, *Report to the Faculty, Administration, Trustees, Students of Brooklyn College, City University of New York*, April 1999, p. 17.
10. Beth McMurtrie, "Accreditors Revamp Policies to Stress Student Learning," *Chronicle of Higher Education*, 7 July 2000.
11. Murray Sperber, *Beer and Circus* (New York: Henry Holt & Co., 2000), p. 269.
12. Ibid.
13. William H. Honan, "Some Say College Accreditation is Out of Control," *New York Times*, 11 November 1998.
14. Commission on Colleges, Southern Association of Colleges and Schools, *Criteria for Accreditation*, December 1997, p. 19.

15. Giovanna Dell'orto, Associated Press writer, "Arizona Astrology School Accredited," *Washington Post*, 27 August 2001.
16. Middle States Commission on Higher Education, *Characteristics of Excellence in Higher Education*, p. 7.
17. William B. Allen, Director of State Council of Higher Education for Virginia, *General Education in Virginia's System of Higher Education*, (presentation to the Governor's Blue Ribbon Commission on Higher Education, February 1999).
18. Ralph A. Wolff, "The Challenges Facing Accreditation," *Chronicle of Higher Education*, 9 June 1993.
19. Courtney Leatherman, "How Aggressive Should Accrediting Agencies Be?" *Chronicle of Higher Education*, 6 January 1993.
20. Commission on Institutions of Higher Education, New England Association of Schools and Colleges, *Standards of Accreditation*, <<http://www.neasc.org/cihe/stancihe.htm>>.
21. Commission on Institutions of Higher Education, North Central Association of Colleges and Schools, *Handbook of Accreditation*, 2nd ed. (September 1997), p. 90.
22. Barbara Martinez, "Hospital's Accreditation Status Proves a Poor Predictor of Care, Study Says," *Wall Street Journal*, 29 January 2002.
23. Senior College Commission, Western Association of Schools and Colleges, *WASC 2001 Handbook of Accreditation*, "The Standards," <<http://www.wascweb.org/senior/handbook.pdf>>, p. 21.
24. See Peter Sacks, *Generation X Goes to College*, (Chicago: Open Court, 1996) for a discussion of the work-averse characteristics of contemporary college students.
25. Sperber, *Beer and Circus*, p. 114.
26. Paul A. Trout, "Disengaged Students and the Decline of Academic Standards," *Academic Questions* 10, no. 2 (spring 1997): pp. 46-56.
27. Empire Foundation and American Council of Trustees and Alumni, preface to *A Failure to Set High Standards: CUNY's General-Education Requirements*, March 1998.

28. See, for example, Thomas Bertonneau, *Declining Standards at Michigan Public Universities*, Mackinac Center for Public Policy, 1997; Colleen Sheehan, *Are Pennsylvania Students Receiving the Fundamentals of a College Education?*, Pennsylvania Association of Scholars and Commonwealth Foundation, 1998; Robert Lerner and Althea Nagai, *Dumbing Down: Multiculturalism and the Demise of the Liberal Arts at Maryland's Public Universities and Colleges, Except Morgan State*, Calvert Institute for Policy Research, March 1999; Shawn Ross, *Lowering the Bar: Washington Public Universities Fail to Maintain High Core Curriculum Standards*, Washington Association of Scholars and Washington Institute Foundation, 2000; *The Dissolution of General Education: A Review of Arizona's Three State Universities' Programs of Study and Degree Requirements*, Arizona Association of Scholars, 2000.
29. National Association of Scholars, *The Dissolution of General Education: 1914-1993*, 1996, p. 62.
30. Middle States Commission on Higher Education, *Characteristics of Excellence in Higher Education*, p. 13.
31. William F. Meehan III, *Caught Short: General Education at Nine Minnesota Public Universities*, Minnesota Association of Scholars, June 2001.
32. Commission on Institutions of Higher Education, North Central Association of Colleges and Schools, *Handbook of Accreditation*, p. 23.
33. Based on personal discussions with Campbell University faculty members, 2002.
34. Commission on Colleges, Southern Association of Colleges and Schools, *Principles of Accreditation*, p. 13.
35. Honan, "Some Say College Accreditation is Out of Control."
36. See, for example, Stephen S. Weiner, "Accrediting Bodies Must Require a Commitment to Diversity When Measuring a College's Quality," *Chronicle of Higher Education*, 10 October 1990.
37. See, for example, Edwin Delattre, "Diversity Standards Compromise Rigor," *Chronicle of Higher Education*, 18 December 1991.

38. Thomas E. Dillon, "Coming After U.," *Policy Review*, (spring 1995): p. 39.
39. Ibid.
40. Ralph Frammolino, "Getting grades for diversity?" *Los Angeles Times*, 23 February 1994.
41. Gerhard Casper, letter to Sister Magdalen Coughlin, Chair of WASC's Committee on Diversity, 4 February 1994.
42. Martin, "Recent Developments Concerning Accrediting Agencies in Postsecondary Education," p. 128.
43. Ibid., p. 130.
44. James W. Brosnan, "U.S. panel debates diversity standard for accreditation," *The (Memphis) Commercial Appeal*, 22 November 1991.
45. See, for example, *Report to the Faculty, Administration, Trustees, Students of Brooklyn College*, p. 26.
46. The College Board, *Trends in College Pricing 2000*, Table 8, <<http://www.collegeboard.com>>, p. 15.
47. Ibid., Table 1, p. 4.
48. Scott Swail, Associate Director of Policy at The College Board, quoted in Jane Bryant Quinn, "New Schools of Thought on College Loans," *Washington Post*, 14 November 1999.
49. Flora Tartakovsky, "The Tuition Tamers," *Time*, 14 February 2000, p. 70.
50. Alan Reynolds, "The Real Cost of Higher Education, Who Should Pay and How?" in The National Commission on the Cost of Higher Education, *Straight Talk About College Costs and Prices*, Connecticut: Oryx Press, 1998, p. 103.
51. Richard M. Huber, *How Professors Play The Cat Guarding The Cream: Why We're Paying More and Getting Less in Higher Education*, (Virginia: George Mason University Press, 1992), p. 141.
52. The National Commission on the Cost of Higher Education, *Straight Talk About College Costs and Prices*, p. 20.

53. Alan E. Guskin, "Reducing Student Costs and Enhancing Student Learning," Association of Governing Board's *Occasional Paper No. 27* (1994): p. 6.
54. Council for Higher Education Accreditation, executive summary to *Survey of Degree-Granting Institutions, Accrediting Organizations and Higher Education Associations*, April 1998.
55. Ibid.
56. Commission on Colleges, Southern Association of Colleges and Schools, *Report of the Reaffirmation Committee*, George Mason University, April 2001, p. 35.
57. Brosnan, "U.S. panel debates diversity standard for accreditation."
58. 255 U.S. 81 (1921).
59. *Schechter Poultry Corp. v. United States*, 295 U.S. 495 (1935).
60. See, for example, David Schoenbrod, *Power Without Responsibility: How Congress Abuses the People Through Delegation* (Connecticut: Yale University Press, 1993), pp. 40-46.
61. Ralph A. Wolff, "The Challenge Facing Accreditation," *Chronicle of Higher Education*, 9 June 1993.
62. Jon Westling, "Getting Government Out of Higher Education," *Heritage Lecture No. 533*, May 3, 1995, <http://www.heritage.org/library/categories/education/lect533.html>, p. 5.

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